

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,
Plaintiff

V.

JONATHAN WILLIAM WALL,
Defendant

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) Criminal No. SAG-19-CR-0500
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DEFENDANT'S MOTION FOR PRELIMINARY HEARING
REGARDING STATEMENTS OF ALLEGED CO-CONSPIRATORS

NOW COMES the Defendant, Jonathan William Wall, by counsel, and moves that the Court schedule a preliminary hearing in which it requires the Government submit a proffer of the evidence it intends to introduce at trial regarding co-conspirator statements for the reasons set forth in the accompanying Brief.

WHEREFORE, the Defendant respectfully requests:

A. That the Court schedule a preliminary hearing in which it requires the Government to submit a proffer of the evidence it intends to introduce at trial regarding co-conspirator statements.

B. That, even if the Court chooses not to schedule a preliminary hearing as to this issue, it still requires that the Government submit a proffer of the evidence it intends to introduce at trial regarding co-conspirator statements.

Respectfully submitted this First day of November 2020,

s/Jason Flores-Williams, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this date of November 1, 2020, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Jason Flores-Williams

Jason Flores-Williams